

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

UNITED STATES DISTRICT COURT 2023 JAN 12 PM 12:29
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA

v.

MUHAMET DEMAJ,
Defendant.

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Case No. 2:23-cr-7

INDICTMENT

The Grand Jury charges:

Count One

On or about April 5, 2022, in the District of Vermont, defendant MUHAMET DEMAJ, knowing and in reckless disregard of the fact that certain aliens—K.S. and A.S.—had come to, entered, and remained in the United States in violation of law, transported and moved and attempted to transport and move those aliens within the United States in furtherance of their violations of law.

(8 U.S.C. § 1324(a)(1)(A)(ii))

Count Two

On or about December 18, 2022, in the District of Vermont, defendant MUHAMET DEMAJ, knowing and in reckless disregard of the fact that an alien—V.I.—had come to, entered, and remained in the United States in violation of law, transported and moved and attempted to transport and move that alien within the United States in furtherance of his violation of law.


(8 U.S.C. § 1324(a)(1)(A)(ii))

Forfeiture Notice

1. The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture bases.
2. Pursuant to 18 U.S.C. § 982, upon conviction of the offense alleged in Count One, the defendant, Muhamet Demaj, shall forfeit to the United States the 2016 Mercedes GL-450 bearing VIN 4JGDF6EE6GA670000 as a vehicle used in the commission of a violation of 8 U.S.C. § 1324(a) (Section 274(a) of the Immigration and Nationality Act). The defendant shall also forfeit to the United States property constituting, or derived from, any proceeds obtained, directly or indirectly, as from the commission of the offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.
3. If any described forfeitable property, as a result of any act or omission of the defendant,
 - (1) cannot be located upon the exercise of due diligence;
 - (2) has been transferred or sold to, or deposited with, a third party;
 - (3) has been placed beyond the jurisdiction of the court;
 - (4) has been substantially diminished in value; or
 - (5) has been commingled with other property which cannot be subdivided without difficulty,the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p) and 18 U.S.C. § 982(b).

TRUE BILL


FOREPERSON


NIKOLAS P. KEREST (MJL)
United States Attorney
Burlington, Vermont
January 12, 2023